MEMORANDUM

TO: Roy Crossland, EPA/START DPO

FROM: Ryan Schuler, E & E/STM

THRU: Robert C. Overfelt, CPG, E & E/START PM

DATE: April 24, 2000

SUBJECT: Removal Site Evaluation (PRP led): Huge Company, Inc., St. Louis, Missouri

CERCLIS I.D.: MO0000602581
SSID: XB
TDD: S07-99-02-0010
PAN: 1167HCSSXX
OSC: Jim Silver

INTRODUCTION

The Ecology & Environment, Inc. (E & E), Superfund Technical Assessment and Response Team (START) for Region 7 was tasked by the U.S. Environmental Protection Agency (EPA) Emergency Response and Removal (ER&R) program, under Technical Direction Document (TDD) S07-99-02-0010, to perform site evaluation and photo documentation during a potential responsible party (PRP) pesticide removal at the Huge Company, Inc site in Pagedale, Missouri. Specific elements of this task included documenting on-site activities, organizing site documentation files, and providing photo documentation during the removal activities. START member (STM) Ryan Schuler was assigned as the project manager for this task. The EPA on-scene coordinator (OSC) was Jim Silver.

BACKGROUND, SITE DESCRIPTION, AND SITE HISTORY

Huge' is located at 7625 Page Boulevard in Pagedale, Missouri, which is within the St. Louis metropolitan area (see Attachment 1: Site Location Map). The facility is currently active, and has been a pesticide-mixing operation since 1974. According to Thomas Huge', owner of the Huge' operation, the company produces two types of products: a liquid-spray insecticide and a floor cleaner/degreaser. In addition to on-site formulation, the company purchases liquid and solid insecticides and herbicides made by other companies and packages them under Huge's name. These products are stored on the site in various-sized containers ranging from 16-ounce jars to 55-gallon drums.

On October 23, 1994, a company installing a fiber optic cable along a TRRA right-of-way north of (behind) the Huge' building reported that they had exposed a leaking, 8-inch diameter, clay-tile sewer pipe, which was located on the south side of (and parallel to) the railroad track (see Attachment 2: Site Map). The St. Louis Metropolitan Sewer District (MSD) subsequently

responded to the report and noted red-colored water in the excavated area of TRRA's right-of-way. Samples of the red-water were collected, and pesticide contamination was identified through laboratory analysis. Dye tracing conducted by MSD established that floor drains in Huge's mixing room and a storm water inlet in front of a loading door on the south side of the Huge' building were connected to the leaking sewer pipe.

In May 1995, a TRRA maintenance crew reported a potent odor while trenching behind the Huge' facility. The soil that had been excavated during the trenching was stockpiled west of the northwest corner of the Huge' building and covered with plastic. An earthen berm was subsequently constructed at the eastern end of the area to control runoff. In June 1995, TRRA contracted GEHM Environmental (GEHM) to conduct soil sampling of the trenched area and of the stockpiled soil. Elevated levels of chlordane and 2,4,5-trichlorophenoxy acetic acid (2,4,5-TP or Silvex™) were identified in both samples. In addition, the samples from the stockpiled soil exceeded Toxicity Characteristic Leaching Procedure (TCLP) regulatory levels for both of those contaminants.

In September 1995, GEHM conducted exploratory trenching as part of a site investigation attempting to locate possible routes of entry from the facility to the leaking, clay sewer pipe that runs parallel to the tracks. A 12-inch-diameter clay-tile sewer line was found to run from the Huge' facility to the line that runs parallel to the tracks. Samples were collected from the excavated soil (resulting from the trenching activities), and the following compounds were identified in the samples: chlordane, 2,4,5-TP, lindane, heptachlor, dieldrin, 4,4'-dichlorodiphenyl dichloroethane (4,4'DDD), methoxychclor, toluene, ethly benzene, and xylenes.

On March 21, 1996, Missouri Department of Natural Resources (MDNR) conducted a sampling effort in support of a Site Inspection (SI). MDNR completed an Integrated Preliminary Assessment/Site Inspection (PA/SI) report on June 12, 1996. Analytical results from soil samples indicated a potential for a large area of soil contamination, which included four residential yards on Mallard Street, which is directly north of the TRRA right-of-way. Contaminated soil was estimated to cover 1 acre. Soils on the site were found to have elevated levels (i.e., above background) of arsenic, chlordane, and 2,4,5-TP. Chlordane was detected in three of the four yards that were sampled. Other pesticide and herbicide contaminants were also found, but not at levels above Superfund Chemical Data Matrix (SCDM) benchmarks. MDNR referred the site to the EPA for a removal assessment in June 1996.

On June 17th and 18th, 1997, START assisted EPA with the collection and documentation of surface and subsurface soil samples. One hundred sixteen samples were collected and submitted to the Region 7 EPA Laboratory for arsenic, chlordane, and 2,4,5-TP analyses. Five of the soil samples were found to contain concentrations of arsenic and/or chlordane that exceeded the established RALs. Also, stockpiled soil that had been excavated from around the clay-tile sewer line was found to contain concentrations of chlordane and 2,4,5-TP that exceeded TCLP regulatory levels (Information on this activity can be found on TDD: S07-9702-011).

SITE ACTIVITIES

START was initially tasked under this TDD to perform documentation of on-site activities and photo documentation. On February 15, 1999, STM Daryl Andershock documented the

removal of 20 truck loads (approximately 15 tons per load) of existing stockpiled soil from previous site work. For each truck load taken from the site, plastic sheeting was placed over the truck bed as to not contaminate the truck bed. During this removal process, a Dames & Moore representative took soil samples. On February 16, 1999, four trenches were dug to survey the site for possible contamination. The four locations include: 1) North end of Huge building where the pipe exits the building, 2) The north-south "T" connection, approximately 10 meters north of the building, 3) Along the railroad tracks on the west property boundary, and the 4th trench was dug after the water samples were returned on the east side, next to the railroad tracks. All material that was taken from the exploratory trenches was stockpiled for off-site disposal and new fill material was used as backfill.

On April 10, 2000, START Members Joe Parish and Ryan Schuler documented the pumping out of water from the small wetland area just north of the Huge building. The water was submitted to Metropolitan Sewer District (MSD) for discharge permitting and was permitted to be dumped into the sewer. A volume of approximately 5,750 gallons were dumped into the municipal storm sewer along Page Ave. After most of the water had been drained from the small wetland area, the berm on the east side, allowing the water to pool there was cut to allow the water to drain east.

On April 11, 2000, STM Ryan Schuler documented the removal of the spoil piles from the exploratory trenches that were excavated. Each pile was excavated to 6 inches below grade to assure all contaminated soil was disposed of. The total volume of soil removed was 2 truck loads, or approximately 24 yards of soil. Each truck was lined with visqueen, hauled to the Bridgeton, MO landfill, and disposed of as special waste.

The existing 12-inch clay tile pipe apparently discharges to the existing stormwater manhole located west of the site; however access to the manhole was not possible to physically observe the connection. The survey that was done indicated that the 12-inch clay tile pipe aligns with the storm sewer manhole and a change of elevation exists between the stormwater pipe exiting the Huge building and the proposed discharge location. In order to replace this line, TRRA must grant an easement to the Huge Corporation. From April 11, 2000 to present there has been no easement granted. Thus tying up the final stages of this removal. Dames and Moore continues to wait on this easement from TRRA to put in the new sewer line.

FOLLOWUP ACTIVITIES

Further activities will begin when TRRA grants Huge an easement to their property to install the new sewer line.

CONCLUSION

START assisted EPA with the documentation of site activites while the PRP was on site. Activities performed included: 1) Excavation of 4 test pits to determine what was present in the soil, 2) Pumping of water out of the small wetland area, just north of the Huge building and discharging water into the municipal storm sewer, 3) Removal of berm (east side of wetland) to

allow drainage to the East, 4) Removal of spoil from test pits to be disposed of as special waste and, 5) Pending easement approval, replacing the old sewer line with a new one. The final stages of this project have not been completed due to circumstances beyond the PRP's control. The TRRA have not written an easement to allow for the new sewer line to be installed, thus the project is on hold until this easement is granted.

ATTACHMENTS

A: Map 1: Site Location Map
B: Map 2: Site Sketch Map
C: Photographic Record